

INTERVENTION ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

2004 OCT 14 A 8:00

Arizona Corporation Commission

DOCKETED

OCT, 14 2004

MARC SPITZER, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON
KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
WWC LICENSE LLC ("WESTERN WIRELESS
CORPORATION") FOR DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS
CARRIER AND REDEFINITION OF RURAL
TELEPHONE COMPANY SERVICE AREA

DOCKET NO. T-04248A-04-0239

**ARIZONA LOCAL EXCHANGE
CARRIERS ASSOCIATION'S
MOTION TO INTERVENE**

The Arizona Local Exchange Carriers Association ("ALECA"), by and through its counsel undersigned, hereby moves the Arizona Corporation Commission for leave to intervene in the above-captioned proceeding pursuant to A.A.C. R14-3-105 and the Administrative Law Judge's Procedural Order dated September 3, 2004. This motion is supported by the following facts and information:

1. On March 26, 2004, WWC License LLC dba CellularOne® ("Western Wireless"), filed an application (the "Application") for designation as an Eligible Telecommunications Carrier ("ETC") for federal universal service funding in certain rural and non-rural service areas in the State of Arizona. Western Wireless also requested that the affected rural local exchange carrier ("LEC") service area be redefined.

2. According to the Application, the affected rural LECs include Rio Virgin Telephone Company, Southwestern Telephone Company and Verizon California Inc.

3. ALECA is a non-profit corporation whose members include most of the rural LECs providing telephone service in Arizona. ALECA members have determined that the most efficient and cost-effective way for most of the LECs to participate in these types of proceedings is through their trade association. One ALECA member--Southwestern Telephone

1 Company—will be directly and substantially affected by the Commission's decision in this
2 proceeding.

3 4. The granting of intervenor status to ALECA will not delay this proceeding or
4 cause the issues to be unduly broadened.

5 5. The name, address, telephone number, facsimile number and e-mail address of
6 the person upon whom service of all documents is to be made is:

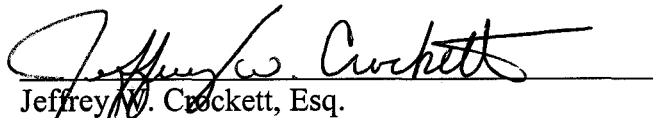
7 Jeffrey W. Crockett, Esq.
8 Kimberly A. Grouse, Esq.
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15 E-mail: jcrockett@swlaw.com
16 E-mail: kgrouse@swlaw.com

17 6. A copy of this Motion to Intervene has been sent via first class mail by counsel
18 undersigned to the attorneys for Western Wireless, and to the other parties of record on the
19 service list following this motion.

20 WHEREFORE, ALECA respectfully requests that the Commission grant its motion to
21 intervene in the above-captioned proceeding.

22 RESPECTFULLY submitted this 14th day of October, 2004.

23 SNELL & WILMER

24 

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Attorneys for Arizona Local Exchange Carriers Association

1 ORIGINAL and thirteen (13) copies filed with Docket
2 Control this 14th day of October, 2004.

3 A COPY of the foregoing was hand-delivered
4 this 14th day of October, 2004, to:

5 Teena Wolfe
6 Administrative Law Judge
7 Hearing Division
8 ARIZONA CORPORATION COMMISSION
9 1200 West Washington
10 Phoenix, Arizona 85007

11 A COPY of the foregoing was mailed
12 this 14th day of October, 2004, to:

13 Christopher C. Kempley, Chief Counsel
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